

8. The Local Rules provide, and the Court generally imposes, the following deadlines:

Last day for filing motions to add or join parties or amend pleadings	60 days after issue is joined
Last day to furnish expert witness reports and disclosures by plaintiff	60 days after Rule 26(f) conference
Last day to furnish expert witness reports and disclosures by defendant	90 days after Rule 26(f) conference (or 60 days after the answer, whichever is later)
Last day to file motions	30 days after close of discovery

If any party requests a modification of these deadlines,

- (a) Identify the party or parties requesting the modification: **NONE**.
- (b) State which deadline should be modified and the reason: **N/A**

9. If the case involves electronic discovery,

(a) State whether the parties have reached an agreement regarding the preservation, disclosure, or discovery of electronically stored information, and if the parties prefer to have their agreement memorialized in the scheduling order, briefly describe the terms of their agreement: **The parties will take reasonable measures to preserve relevant electronic information. Defendant will endeavor to preserve any electronic information, to the extent that it exists, related to Plaintiff's account. Other information will be preserved in accordance with the Defendant's document retention policies. To the extent that it exists, the parties will produce relevant, non-privileged, electronic information in pdf or paper format.**

(b) Identify any issues regarding electronically stored information as to which the parties have been unable to reach an agreement – **NONE**.

10. If the case is known to involve claims of privilege or protection of trial preparation material,

(a) State whether the parties have reached an agreement regarding the procedures for asserting claims of privilege or protection after production of either electronic or other discovery material: **The parties agree that inadvertent disclosure of information protected by the attorney-client and/or work-product privilege shall not constitute a waiver of an otherwise valid claim of privilege. The parties further agree to return any inadvertently disclosed privileged and/or trial-preparation material in**

accordance with Federal Rule of Civil Procedure 26 (b)(5)(B) and Federal Rule of Evidence 502(b).

(b) Briefly describe the terms of any agreement the parties wish to have memorialized in the scheduling order (or attach any separate proposed order which the parties are requesting the Court to enter addressing such matters): **The parties anticipate that a Protective Order will be required governing the disclosure of confidential documents produced during discovery. The parties will submit a proposed Agreed Protective Order for the Court's consideration.**

(c) Identify any issues regarding claims of privilege or protection as to which the parties have been unable to reach an agreement: **NONE.**

11. State any other matters the Court should include in its scheduling order: **NONE**

12. The parties certify by their signatures below that they have discussed the nature and basis of their claims and defenses and the possibilities for prompt settlement or resolution of the case. There are no specific problems that have created a hindrance to the settlement of the case:

Respectfully submitted, this 16th day of June, 2016.

s/ Levi White

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s/ Alan D. Leeth

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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of June, 2016, I presented the foregoing **RULE 26(F) REPORT** to the Clerk of Court for filing and uploading to the CM/ECF system, which will automatically send email notification of such filing to the following attorneys of record:

N/A

I have mailed by first-class, United States mail, postage prepaid the document to the following non-CM/ECF participants:

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s/ Alan D. Leeth

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